

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT LAVON BROADIE

Magistrate No. 24-1247

[UNDER SEAL]

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Special Agent Mahira Khan, being first duly sworn and states that she is a Special Agent of the Federal Bureau of Investigation and charges as follows:

PURPOSE OF THIS AFFIDAVIT AND BACKGROUND OF THE AGENT

1. This Affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint that on or about October 25, 2023, in the Western District of Pennsylvania, Robert Lavon Broadie (“**BROADIE**”), the defendant, knowing he has previously been convicted of a crime punishable by imprisonment for more than one year, knowingly possessed, in and affecting interstate commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1). The firearm that **BROADIE** unlawfully possessed was a semiautomatic Glock 23 pistol, bearing serial AAGZ543 with a partially loaded .40 caliber extended magazine.

2. I am an “investigative or Law Enforcement Officer of the United States” within the meaning of 18 U.S.C. Section 2516. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (“FBI”) and have been so since December 2020. I am currently assigned to the Greater Pittsburgh Safe Streets Task Force (“GPSSTF”). The GPSSTF is a group of federal, state, and local agencies that work together in the Greater Pittsburgh area to focus investigative resources on violent crimes and related offenses. Before joining FBI Pittsburgh, I received extensive training at the FBI Academy in Quantico, Virginia. I was trained in a variety of investigative and legal matters, including investigating federal firearms and

narcotics related violations, conducting surveillance, establishing probable cause, and executing search and arrest warrants. Before joining the FBI, I also spent approximately four years as an attorney licensed to practice in Maryland, where I investigated and prosecuted criminal offenses. I remain barred and in good standing with the Maryland State Bar. As a Special Agent with the FBI and previously as an attorney, I have been involved in many narcotics-related investigations and the service of many narcotics and firearms-related arrest and search warrants. As a Special Agent specifically, I have handled cooperating sources who were involved in narcotics acquisition and/or trafficking, participated in controlled purchases of narcotics, and conducted physical and electronic surveillance of drug traffickers and members of criminal organizations. Additionally, I have reviewed communications between drug traffickers and members of criminal organizations as part of my participation in multiple wiretap investigations. As a results of my training and experience, I am familiar with the methods, techniques, packaging, coded language, and concealment methods used by drug traffickers to operate drug-trafficking conspiracies and launder proceeds. I am also familiar with the methods, techniques, coded language, and concealment methods used by those who illegally possess and/or transfer firearms.

3. As an FBI Special Agent, I am an “Investigative or Law Enforcement Officer” of the United States within the meaning of Title 18, United States Code Section 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

4. As an FBI Special Agent, I am responsible for enforcing Federal criminal statutes and am authorized to serve arrest and search warrants under the authority of the United States. I have participated in numerous federal and state search warrants related to firearms and narcotics violations, and I have assisted in the writing of affidavits to this effect.

5. I have participated in criminal investigations with FBI as well as other federal, state and local law enforcement agencies relating to violations of various federal laws. I have been involved in firearms and narcotics-related arrests and the execution of search warrants and arrest warrants, which resulted in the seizure of firearms and narcotics and have assisted in the supervision of activities of confidential informants who provided information and assistance resulting in controlled purchases of and narcotics.

6. I have knowledge of the facts set forth in this Affidavit based on my own participation in this investigation and based on information provided to me by other investigators, to include Jefferson Hills Police Department (JHPD) and Pittsburgh Bureau of Police (PBP). This affidavit is submitted for the limited purpose of establishing probable cause of a violation of 18 U.S.C. § 922(g)(1). Accordingly, it does not include every fact known to me in connection with this investigation.

PROBABLE CAUSE

7. On October 25, 2023, JHPD Officer Ryan Pokorny was on uniform patrol and operating an unmarked JHPD vehicle. At approximately 1042 hours, Officer Pokorny observed a white Dodge Durango pass his location near Route 51 north. The Dodge was so heavily tinted that Officer Pokorny could not see the driver.

8. The Dodge displayed PA plate LYZ3356 and upon running the plate, Officer Pokorny learned it the Dodge was registered to Robert Lavon **BROADIE**. Officer Pokorny further learned that **BROADIE** was a wanted person.

9. As Officer Pokorny began to follow the Dodge, the Dodge began accelerating. Officer Pokorny continued to follow the Dodge at which point the Dodge began making a series of lane changes and creating further distance between the 2 vehicles. Based on the driving habits

of the Dodge and the registered owner, **BROADIE**, being a wanted person, Officer Pokorny believed that the driver of the Dodge was attempting to elude.

10. Officer Pokorny activated his emergency lights and attempted to stop the Dodge for the window tint violation. The Dodge approached a Sunoco at 1344 Route 51 and hit its brakes, making Officer Pokorny believe the vehicle was coming to a stop. Instead, the Dodge switched lanes and began to accelerate. Officer Pokorny advised dispatch of the fleeing Dodge.

11. The Dodge make additional sudden lane changes, during which time the Dodge nearly hit another vehicle. To avoid hitting the other vehicle, the Dodge swerved into a two-way center turn lane and then drove through Route 51 and Coal Valley Road despite the red traffic signal. While going through that intersection, the Dodge almost hit a pedestrian who was attempting to cross the road. Due to the hazards of pursuing the Dodge, Officer Pokorny terminated the pursuit as the Dodge continued at a high rate of speed down Route 51 towards North Lewis Run Road.

12. JHPD officers continued to look for the vehicle in the area. Pleasant Hills Police (PHP) was then dispatched to Bowser Automotive for an incident of a white Dodge Durango throwing a gun out of the window and seen on North Lewis Run Road. A witness stated that she was stopped at the light on Route 51 waiting to turn on North Lewis Run Road. While stopped, she saw police lights in the distance and then saw a white Dodge Durango travel in the opposite lane and turn abruptly onto North Lewis Run Road. As the vehicle turned, the witness's son saw something throw from the Dodge. The witness then turned onto North Lewis Run Road, saw that the item thrown was a gun, and called 9-1-1.

13. Officers recovered a Glock 23 and an open Coach purse. Upon looking in the purse, a white clutch style bag was also located. Upon checking the contents of these bags, a large

quantity of suspected narcotics and other personal effects were found. The Glock was identified by its serial number AAGZ543, which returned as stolen out of Avalon. The following items were packaged and transported to the JHPD station:

- a. Scale with white powder residue;
- b. Clear baggie with suspected powder cocaine;
- c. 2 clear baggies with white crystalline substance;
- d. A pill bottle containing numerous different pills;
- e. Approximately 15 “bricks” and additional loose bundles of suspected heroin/fentanyl;
- f. Trojan condoms;
- g. Coconut oil lip balm;
- h. Clear baggie containing multiple clear plastic baggies.

14. Officers contacted Dean Honda, which had cameras in a position to record the area that the purse and Glock were found. Dean Honda provided the footage. The officers watched the video. There were no items on the ground before the Dodge passed. After the Dodge passed, the video shows an object bounced on the ground and came to rest.

15. On October 28, 2023, PBP officers advised Officer Pokorny that they had taken **BROADIE** into custody and recovered a stolen firearm that belonged to the same victim as the firearm recovered by JHPD on October 25. PBP officers also seized cellular phones from **BROADIE** on that date. Content extractions were conducted on those phones.

16. In June 2024, investigators obtained copies of those extraction reports. In analyzing the content from the phone, investigators observed messages and photos relating to the events of October 25, 2023. Specifically, investigators observed a text message from **BROADIE** at approximately 11:23AM stating “1001 Clairton blvd”. **BROADIE** then sent a screenshot of a map with a “pin” placed. Following those 2 messages, at 11:24AM **BROADIE** sent the text “I threw

it right dere”. Investigators are aware that 1001 Clairton Blvd is the address of Bowser Automotive, which is at the intersection of Route 51 and North Lewis Run Road. Investigators obtained map images of the intersection of Route 51 and North Lewis Run Road, and it is identical to the screenshot sent by **BROADIE**. Investigators noted that the “pin” was placed on the location where the Glock and the purse was recovered. Below is the screenshot sent by **BROADIE** (Photo 1), followed by a map image from Google maps with visible street names (Photo 2). As can be seen, the “pin” in photo 1 is placed at the North Lewis Run location where the firearm and narcotics were found.

Photo 1:

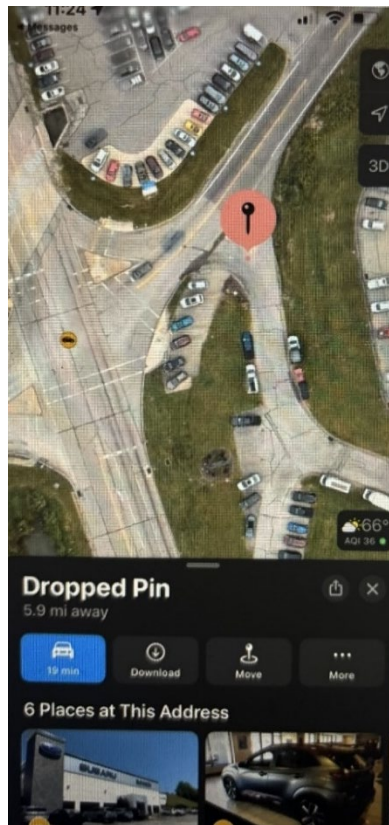
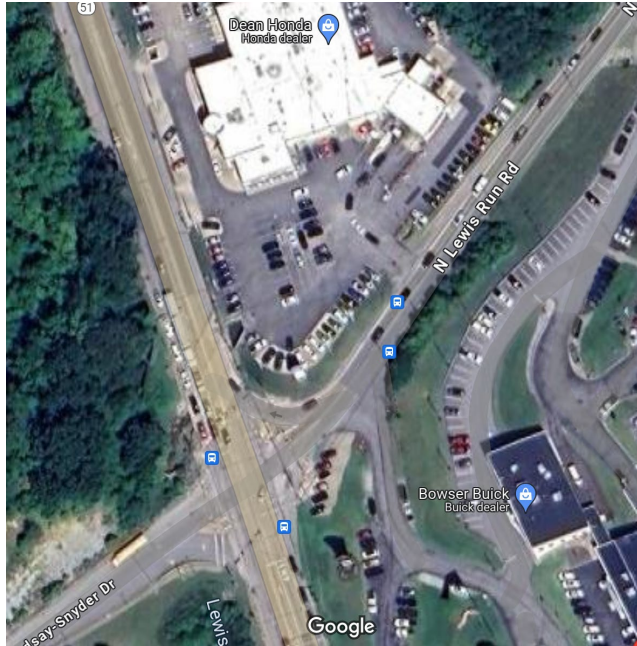


Photo 2:



17. Then, at 11:26AM, **BROADIE**, in response to a text asking “What happened,”

BROADIE sends the following emoji response



, which depicts a vehicle and a puff of smoke following. Based on my knowledge and the context of this conversation, I believe **BROADIE** used this emoji to communicate that he had fled in a vehicle that day.

18. Based on my training and experience, I am aware that drug traffickers utilize firearms as a tool of their trade, to protect themselves, their narcotics, and their drug proceeds from robbery. I am further aware that drug dealers are often the targets of robberies because they carry valuable narcotics and/or large amounts of cash, and are reluctant to call the police if robbed.

19. I am aware from my training and experience and by consulting with an expert from the Bureau of Alcohol, Tobacco, Firearms, and Explosives that Glock firearms are not manufactured in the Commonwealth of Pennsylvania. In fact, I am aware that there are no major firearms manufacturers located within the Commonwealth of Pennsylvania, and therefore this firearm traveled in interstate commerce prior to being possessed by **BROADIE**.

20. I am aware that on April 14, 2010, **BROADIE** was found guilty of felony offenses to include carrying a firearm without a license, robbery, and aggravated assault. **BROADIE** received a term of imprisonment of five to ten years. Accordingly, **BROADIE** is prohibited from possessing a firearm and/or ammunition that moved in interstate commerce, under 18 U.S.C. § 922(g)(1).

21. As set forth above, **BROADIE** is prohibited from possessing firearms due to his prior criminal convictions for felonies.

22. Therefore, there is probable cause to believe that **BROADIE** violated 18 U.S.C. § 922(g)(1).

The above information is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

/s/ Mahira Khan

MAHIRA KHAN

Special Agent

Federal Bureau of Investigation

Sworn and subscribed before me, by telephone
pursuant to Fed. R. Crim. P. 4.1(b)(2)(A)
this 23rd day of July, 2024

THE HONORABLE PATRICIA L. DODGE
United States Magistrate Judge